

1 Joanne M. Brieese
P.O. Box 21328
2 Billings MT 59104-1328
(406 256-5029)
3 ID No. 2321
E-mail: JBrieese106@AOL.COM
4 Fax No. 1-406-256-9905
Attorney for Debtors
5

6 **IN THE UNITED STATES BANKRUPTCY COURT**
FOR THE DISTRICT OF MONTANA

7 In Re: Case No. 13-60769-RBK-13

8 KELLY EDWARD PEDERSON and
REBECCA LEA PEDERSON,
9
Debtors.
10

11 11 U.S.C. 1329
L.B.R. 3015(3)
12

13 **MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION**
AND NOTICE
14

15 Debtors, KELLY EDWARD PEDERSON and REBECCA LEA PEDERSON, by and
16 through attorney JOANNE M. BRIESE, move the Court to modify Chapter 13 Plan after
17 confirmation pursuant to 11 U.S.C. §1329 and Mont. L.B.R. 3015-3, upon the following
18 grounds:

- 19 1. Plan requires modification to change provisions for payment to Shotgun
20 Properties and to the Trustee.
21 2. Plan requires modification to allow Debtors to successfully complete their
22 Chapter 13 Plan.

23 WHEREFORE, the undersigned moves the Court to enter its Order modifying Debtors'
24 confirmed Chapter 13 plan as proposed in the attached First Modified Plan dated 7 October
25 2013.

26 DATED this 25th day of October 2013.
27

28 /s/ **JOANNE M. BRIESE**

JOANNE M. BRIESE

NOTICE TO CREDITOR

If you object to the motion, you must file a responsive pleading and request a hearing within **FOURTEEN** (14) days of the date of the motion. The Responding party shall schedule the hearing on the motion at least 21 days after the date of the response and request for hearing and shall include in the caption of the responsive pleading the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

DATE: _____ 2013

TIME: _____ a.m.

LOCATION: 5th Floor Courtroom - Federal Building
2601 2nd Avenue North
Billings MT 59101

If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.

DATED this 28th day of October 2013.

/s/ **JOANNE M. BRIESE**
JOANNE M. BRIESE
Attorney for Debtors

CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY, I HEREBY CERTIFY that I served a true and correct copy of the foregoing MOTION FOR MODIFICATION OF PLAN AND NOTICE upon the following named parties by United States Mail, postage prepaid, on this 28th day of October 2013:

Neal Jensen - via electronic filing

Robert G. Drummond - via electronic filing

Kelly and Rebecca Pederson
P.O.Box 658
Culbertson MT 19218-0658

All Creditors on Mailing Matrix attached.

/s/ **JOANNE M. BRIESE**
JOANNE M. BRIESE